

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**

Washington, D.C. 20554

**In the Matter of:**

***Digital Audio Broadcasting Systems  
And Their Impact on the Terrestrial  
Radio Broadcast Service***

) MM Docket No. 99-325

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To: The Commission:

Comments of **Equipoise – For Balance in Media**, Larissa Sutherland, President, on rulemaking proposal 99-325, regarding the In Band On Channel (IBOC) audio broadcasting initiative. Views herein are shared by the principals of Equipoise, a current applicant for a Low Power FM radio station license.

We are filing these Reply Comments in support of THE VIRGINIA CENTER FOR THE PUBLIC PRESS. Like them, and others, we are opposed to implementation of In Band On Channel (IBOC) Digitalization. We are concerned that IBOC could displace the frequency for which we have applied, and many other frequencies as well. IBOC could displace both aspiring stations, such as ours, and established stations as well.

We urge the Commission to proceed with the Eureka-147 alternative Digitalization technology, which would avoid the displacement problem. Even then, of course, the Eureka-147 technology should first be tested and evaluated as thoroughly as the IBOC technology has been. In no event should IBOC Digitalization be adopted without full and complete testing and evaluation of the less disruptive Eureka-147 Digitalization technology."

Sincerely,

Larissa Sutherland, President  
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